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January 18, 2023

VIA ECF

Honorable Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Javier Aguilar, No. 20-cr-390 (ENV) (E.D.N.Y.)

Dear Judge Vitaliano:

We write to request that the Court modify, in part, Defendant Javier Aguilar's pretrial release travel restrictions. *See* ECF Nos. 7, 35, 37. Mr. Aguilar seeks the Court's one-time permission to travel with his daughters to the District of Colorado from February 16 to 21, 2023 for Presidents' Day weekend. Mr. Aguilar will inform pretrial services of his precise travel plans in advance and will be subject to his usual electronic monitoring.

We have conferred with the U.S. Pretrial Services Offices for the Eastern District of New York and the Southern District of Texas, and neither objects to this request. We also have conferred with counsel for the government, who indicated that the government has no objection, so long as Pretrial Services did not object.

We thank the Court for its attention to these issues.

Respectfully submitted,



Alex Spiro
Counsel for Defendant Javier Aguilar

cc: Counsel of Record (via ECF)
Officer Bianca Carter, U.S. Pretrial Services Office (E.D.N.Y.) (via email)
Officer Ryan McLellan, U.S. Pretrial Services Office (S.D. Tex.) (via email)

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